

<b>UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY</b>	
<b>Caption in Compliance with D.N.J. LBR 9004-1(b)</b>	
Bradford J. Sandler	
Paul J. Labov	
Colin R. Robinson	
PACHULSKI STANG ZIEHL & JONES LLP	
1700 Broadway, 36 <sup>th</sup> Floor	
New York, New York 10019	
Telephone: (212) 561-7700	
Facsimile: (212) 561-7777	
Email: bsandler@pszjlaw.com	
plabov@pszjlaw.com	
crobinson@pszjlaw.com	
<i>Counsel for the Plan Administrator</i>	
In re:	Chapter 11
BED BATH & BEYOND INC., <i>et al.</i> , <sup>1</sup>	Case No. 23-13359 (VFP)
Debtors.	(Jointly Administered)

**CERTIFICATION OF COUNSEL REGARDING PLAN ADMINISTRATOR'S  
SEVENTEENTH OMNIBUS OBJECTION (SUBSTANTIVE) TO CLAIMS  
(Reclassified Gift Card/Merchandise Credit Claims No. 14)**

The undersigned hereby certifies that:

1. On March 26, 2025, the above-captioned debtors and debtors in possession (the "Debtors") filed the *Plan Administrator's Seventeenth Omnibus Objection (Substantive) to Claims*

---

<sup>1</sup> The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these chapter 11 cases and each such Debtor's tax identification number may be obtained at <https://restructuring.ra.kroll.com/bbby>. Pursuant to the *Certificate of Amendment of the Certificate of Incorporation of Bed Bath & Beyond Inc.*, which was filed with the State of New York Department of State on September 21, 2023, the name of the entity formerly known as "Bed Bath & Beyond Inc." was changed to *20230930-DK-Butterfly, Inc.* [Filing ID No. 230921001833 DOS ID 315602].

(Reclassified Gift Card/Merchandise Credit Claims No. 14) [Docket No. 3964] (the “Seventeenth Omnibus Objection”).<sup>2</sup>

2. Pursuant to the *Notice of Objection to Your Claim* [Docket No. 3965] (the “Notice”) the deadline to object to the Seventeenth Omnibus Objection was April 22, 2025 (the “Objection Deadline”), and a hearing was scheduled for April 29, 2025 at 10:00 a.m. (ET) (the “Hearing”).

3. On April 25, 2025, Ari Bussel (“Claimant”) submitted an objection to the Seventeenth Omnibus Objection [Docket No. 4013].

4. The docket entry related to the Seventeenth Omnibus Objection reads, “Minute of Hearing Held, OUTCOME: Granted to all claimants, except to Mr. Bussel without prejudice; Revised Order to be Submitted. (related document:[3964](#) Motion re: Plan Administrators Seventeenth Omnibus Objection (Substantive) to Claims (Reclassified Gift Card/Merchandise Credit Claims No. 14) Filed by Bradford J. Sandler on behalf of Plan Administrator. Hearing scheduled for 4/29/2025 at 10:00 AM, VFP - Courtroom 3B, Newark.. (Attachments: # [1](#) Exhibit A # [2](#) Exhibit B) Filed by Other Prof. Plan Administrator) (mcp). ”

5. For the reasons discussed on the record at the Hearing, the attached revised proposed order removes Claim 18806 (the “Claim”) filed by Claimant. The Plan Administrator, the Debtors, the Estates and the Claimant reserve all rights, claims and defenses with respect to the Claim, and Claimant shall have additional time to respond to the Seventeenth Omnibus Objection.

6. It is hereby respectfully requested that the proposed order attached hereto as Exhibit A (the “Order”) be entered at the Court’s convenience. A redline of the revised Order

---

<sup>2</sup> Capitalized term used but not otherwise defined herein shall have the meaning ascribed to it in the Omnibus Objection.

showing the changes from version originally filed with the Seventeenth Omnibus Objection is attached hereto as **Exhibit B**.

7. Based on the foregoing, the Plan Administrator respectfully requests entry of the Order at the Court's earliest convenience.

Dated: May 16, 2025

*/s/ Colin Robinson*

---

Bradford J. Sandler  
Paul J. Labov  
Colin Robinson  
PACHULSKI STANG ZIEHL & JONES LLP  
1700 Broadway, 36<sup>th</sup> Floor  
New York, New York 10019  
Telephone: (212) 561-7700  
Facsimile: (212) 561-7777  
Email: bsandler@pszjlaw.com  
plabov@pszjlaw.com  
crobinson@pszjlaw.com

*Counsel to the Plan Administrator*